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Attorneys for Defendants
HAWAIIAN AIRLINES, INC. and
HAWAIIAN HOLDINGS, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RIKI O'HAILPIN, NINA ARIZUMI,
ROBERT ESPINOSA, ERWIN
YOUNG, PUANANI BADIANG,
SABRINA FRANKS, RONALD LUM,
DANI SAIKI, and BRANDEE AUKAI,
on their own behalf and on behalf of all
others similarly situated,

Plaintiffs,

vs.

HAWAIIAN AIRLINES, INC. and
HAWAIIAN HOLDINGS, INC.,

Defendants.

Civil No.: 1:22-cv-00532-JAO-RT

**DEFENDANTS HAWAIIAN
AIRLINES, INC. AND HAWAIIAN
HOLDINGS, INC.'S NOTICE OF
RELATED CASES**

No Trial Date Set.

**DEFENDANTS HAWAIIAN AIRLINES, INC. AND
HAWAIIAN HOLDINGS, INC.’S NOTICE OF RELATED CASES**

Defendant HAWAIIAN AIRLINES, INC. (“Hawaiian”) and Defendant HAWAIIAN HOLDINGS, INC. (“Hawaiian Holdings” and collectively with Hawaiian, “Defendants”), by and through their attorneys Dentons US LLP, respectfully submit the following Notice of Related Cases. The cases listed below all include Hawaiian as a defendant and plaintiffs who are presenting claims of religious discrimination under Title VII and/or failure to accommodate under the ADA. In all of these cases, plaintiffs allege that Hawaiian unreasonably denied their requests for accommodation with respect to Hawaiian’s COVID-19 vaccine policy. These cases generally fall under two categories: (1) related actions where individual plaintiffs have identical claims against Defendants in two separate actions; and (2) other related actions with similar claims concerning Hawaiian’s COVID-19 vaccine policy.

**A. Actions Where Individual Plaintiffs Have Duplicative Actions
Against Defendants**

The following cases involve individual plaintiffs that now have two pending actions before this Court with identical claims, because the plaintiffs had simultaneously filed their claims in state and federal courts and Defendants’ removed the state court actions to this Court.

- *Brody vs. Hawaiian Airlines, Inc., et al.*; Civil No. 1:22-cv-000482 JAO-KJM
Brody vs. Hawaiian Airlines, Inc., et al.; Civil No. 1:23-cv-00046 HG-KJM [1/26/2023 removed from the Circuit Court of the First Circuit, State of Hawai'i.]
- *Brennan vs. Hawaiian Airlines, Inc., et al.*; Civil No. 1:22-cv-00481 HG-KJM
Brennan vs. Hawaiian Airlines, Inc., et al.; Civil No. 1:23-cv-00047 JAO-RT [1/26/2023 removed from the Circuit Court of the First Circuit, State of Hawai'i.]
- *Kahahawai vs. Hawaiian Airlines, Inc., et al.*; Civil No. 1:22-cv-00484 JAO-WRP
Kahahawai vs. Hawaiian Airlines, Inc., et al.; Civil No. 1:23-cv-00048 JAO-WRP [1/26/2023 removed from the Circuit Court of the First Circuit, State of Hawai'i.]
- *Schenk vs. Hawaiian Airlines, Inc., et al.*; Civil No. 1:22-cv-00483 SOM-WRP
Schenk vs. Hawaiian Airlines, Inc., et al.; Civil No. 1:23-cv-00049 SOM-WRP [1/26/2023 removed from the Circuit Court of the First Circuit, State of Hawai'i.]

The actions originally filed in 2022 and the 2023 “removal” actions should be consolidated such that there is only one action for each plaintiff, as their claims are duplicative.

B. Other Related Actions With Similar Claims Against Defendants Concerning Hawaiian’s COVID-19 Vaccine Policy

In addition to the cases listed above in Section A, the following cases also share: (1) claims under Title VII and/or the ADA relating to Hawaiian’s COVID-19 vaccine policy, and (2) allegations that during the time period 2021-2022,

Hawaiian unreasonably denied requests for religious and/or disability-related accommodations with respect to the COVID-19 vaccine policy.

- *O'Hailpin, et al. vs. Hawaiian Airlines, Inc., et al.*; Civil No. 1:22-cv-00532 JAO-RT¹
O'Hailpin, et al. vs. Hawaiian Airlines, Inc., et al.; Civil No. 1:22-cv-00007 JAO-KJM [CLOSED]²
- *Kahauolopua vs. Hawaiian Airlines, Inc.*; Civil No. 1:22-cv-00531 DKW-WRP
- *Nakamitsu vs. Hawaiian Airlines, Inc.*; Civil No. 1:22-cv-00536 DKW-KJM
- *Victorino vs. Hawaiian Airlines, Inc.*; Civil No. 1:22-cv-00527 JMS-RT

DATED: Honolulu, Hawai'i, February 9, 2023.

/s/ JOHN RHEE

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¹ The *O'Hailpin* plaintiffs have filed a class action complaint. Defendants maintain that although there is no basis for certification, the related nature of these actions may warrant assignment to a single judge or other form of coordination/case management.

² This Court granted Defendants' motion to dismiss without prejudice based on the Plaintiffs' failure to exhaust administrative remedies. The *O'Hailpin* plaintiffs subsequently filed their new action, Civil No. 1:22-cv-00532 JAO-RT.